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67,010-090; H2616-ED

UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Kenneth Marks
Serial No.: 10/816,092
Filed: 4/1/2004
Art Unit: 2837
Examiner: Miller, Patrick L.
Title: INTEGRATED SKID WITH MULTIPLE-MOTOR
CONTROLLER
Attorney Docket No.: 67010-090; H2616-ED
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Dear Sir:

Appellant now submits this concise Reply Brief in response to the Examiner's Answer mailed 10 January 2007.

Arguments With Regard to the Combination of Cho, et al. and Miura, et al.

The examiner argues that Cho, et al. and Miura, et al. are properly combined and would meet the claims. As argued in the main brief, the combination is not proper. Miura, et al., and in particular the section cited by the examiner, appears to disclose a back-up power supply for sensors for a motor, not the motor itself. There would be no reason to modify the motor of Cho, et al. based upon Miura, et al.

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Arguments With Regard to the Combination of Palleggi, et al. or Katagari, et al., Both Combined With Blomquist

The examiner argues that the appellant's position is simply that neither reference fully discloses the claim. The examiner argues that all of the components are fully met between these references. However, they are not met as required by the claims. Simply, these rejections are improper for the reasons set forth in the main brief. The claim requires that there be at least one DSP and a gate driver interface to select between the DC power supply, and AC power supply, and be able to switch between the two.

The examiner argues that Palleggi, et al. or Katagari, et al. have that structure. However, as admitted by the examiner, they do not switch between a back-up and a main power supply. Blomquist does not include the required structure for performing the switching. Simply, the claims are not properly rejected.

The Rejection of Tisdale, et al. Combined With Cox-Smith

The examiner argues that appellant is attempting to piecemeal the references, and point to what is missing in each of the references, rather than focusing on what is shown by the combination.

The examiner does not approach at all the point appellant makes that there is no suggestion to modify these references. Tisdale, et al. discloses separate motors operating separately. Cox-Smith provides some controls which "synchronize" motor operation, as alleged by the examiner. There is no benefit to any sort of synchronization in the separate motors of Tisdale, et al., and thus no proper combination.

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The Rejection of Tisdale, et al. Combined With Katagari, et al.

There is no suggestion to combine these references. Again, it is not appellant's argument that the references simply fail to anticipate the claims. There is no suggestion to combine these references in any manner as set forth by the examiner. The examiner argues that there is motivation to "improve control reliability," however, Tisdale, et al. includes a complex system and has its own controls. There is nothing that suggests it would be improved by the proposed modification.

The Rejection of Tisdale, et al. Combined With Katagari, et al. and Further in View of Blomquist

Again, the examiner does nothing to address what is missing in each of these references. The switching between the DC and the AC by the specific components is not shown by any of these references. The claims are not properly rejected.

CLOSING

For the reasons set forth above, and for the reasons set forth in the main brief, the rejection of all claims is improper and should be reversed. Such action is solicited.

Respectfully submitted,

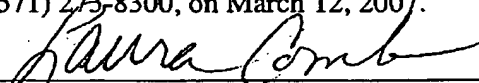


Theodore W. Olds, Reg. No. 33,080
Carlson, Gaskey & Olds
400 W. Maple Road, Ste. 350
Birmingham, MI 48009
(248) 988-8360

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CERTIFICATE OF TRANSMISSION UNDER 37 CFR 1.8

I hereby certify that this correspondence is being facsimile transmitted to the United States patent and Trademark Office, fax number (571) 273-8300, on March 12, 2007.


Laura Combs